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March 14, 2004

Randy Freking, Esq.
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RE: Kammeyer, et al., v. City of Sharonville, Ohio, et al.

Dear Randy:


This comes to you along with copies of my file in the above matter, pursuant to the subpoena issued in C-1-01-649. Consistent with our discussion on the issue, did not make copies of the research I completed, primarily on the issue of sovereign immunity and the issues presented by Collins v. Sotka, 81 Ohio St.3d 506 (1998). I also did not make copies of public and court documents relating to assets which may be owned by Albert Schuholz. In the event you would like copies of any of these documents just give me a call. As you directed in your letter of March 4, 2004, I have not produced anything I believe to be privileged.

As we discussed, in response to a request by Paul Laufman, I caused copies of my file to be made in order to assist in his representation of my former clients. It appears the portions copied for Paul were not returned to the main file and have been mis-filed. I have included a copy of a letter to Paul addressing this issue. Acknowledging my responsibility under the subpoena, if this is not acceptable, please advise how you wish to proceed.

During our discussions regarding the subpoena, you indicated an interest in any communication I had with Mayor Lovitt. While I am almost positive I sent a demand letter to the Mayor, I cannot locate my file copy of the letter. However, I did locate the notes from my December 2, 1999, telephone conversation with the Mayor, which are included.

Please let me know if there are any issues unresolved. I look forward to hearing from you in the near future.

Very truly yours.


JAY CLARK
Attorney at law.

